

FROM

MEMO ENDORSED

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

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OUR FILE NUMBER:

000455 00001
12484795.1

September 29, 2014

VIA ECF AND FACSIMILE (212) 805-7927

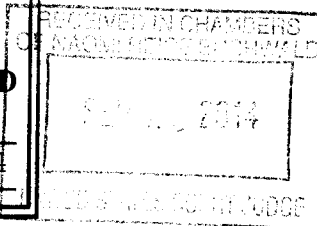
Honorable Naomi Reice Buchwald
United States District Court
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 09/30/2014



Re: SEC v. China Northeast Petroleum Holdings Ltd., et al., No. 12-CV-8696

Dear Judge Buchwald:

Atkinson, Andelson, Loya, Rudd & Romo ("AALRR") is counsel to individual defendant Hongjun Wang ("Mr. Wang") in the above-referenced action.

Pursuant to your Honor's Individual Practices Rule No. 2.B., AALRR respectfully requests a pre-motion conference to obtain leave to file a Motion to Withdraw as counsel to Mr. Wang in this action, or in the alternative, leave to file such Motion to Withdraw without a pre-motion conference.

AALRR's Motion to Withdraw is substantively based on information obtained in and during privileged and confidential attorney-client communications. Therefore, consistent with our ongoing obligation to preserve the confidentiality of such communications, and to avoid prejudicing Mr. Wang's related rights, we also respectfully request that the Court "so order" this letter permitting us to file our Motion to Withdraw and supporting documents under seal.

Respectfully submitted,

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

Joseph N. Akrotirianakis

JNA:jag

ENDORSEMENT

A motion to withdraw
may be filed without
a pre-motion conference.

Naomi Reice Buchwald,
USDC

September 30, 2014

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